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From: Swanson, Stephanie

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Matter: Fax to Judge Young

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Enclosed please find a Stipulation for Judge Young. Thank you.

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FAX TRANSMISSION**DATE** September 15, 2022

RECIPIENT	COMPANY	FAX	TEL
Honorable John Milton Younge	US District Court for the Eastern District of Pennsylvania	267-299-7368	

SENDER	EMAIL	FAX	TEL
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MESSAGE

Attached please find a Stipulation for Extension of Time for Defendant to
Answer or Otherwise Respond to Plaintiffs' Complaint

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September 15, 2022

Via Facsimile

Honorable John Milton Younge
U.S. District Court for the Eastern District of Pennsylvania
4007 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: *Toni Lee Cavanagh, Esquire, Denise McCrae, Esquire, Nicholena Rushton, Esquire v.
County of Delaware; Civil Action No. 2:22-cv-03174-JMY*

Dear Judge Younge:

This firm represents Defendant County of Delaware ("Defendant") in the above-referenced action. I am enclosing a stipulation for the Court's consideration between all parties to the action extending the time for Defendant to answer or otherwise respond to Plaintiffs' Complaint to November 1, 2022.

This is the first extension of time sought to respond to Plaintiffs' Complaint.

Thank you for your courtesy and consideration.

Respectfully submitted,

/s/ Meredith S. Dante

Meredith S. Dante
MSD/jks

cc: Elizabeth K. McManus (via email)
Marc E. Weinstein (via email)
Vincent J. Pentima (via email)

Enclosure

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TONI LEE CAVANAGH, ESQUIRE,
DENISE McCRAE, ESQUIRE,
NICHOLENA RUSHTON, ESQUIRE,**
Individuals, by and on behalf of
themselves and all persons similarly situated,

Plaintiffs,

v.

COUNTY OF DELAWARE,

Defendant.

CIVIL ACTION NO.:
2:22-CV-03174-JMY

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

WHEREAS, Plaintiffs Toni Lee Cavanagh, Esq., Denise McCrae, Esq., and Nicholena Rushton, Esq. (collectively, the "Plaintiffs") served their Complaint on Defendant County of Delaware ("Defendant") on September 1, 2022;

WHEREAS Defendant's response to Plaintiffs' Complaint is due on September 22, 2022;

NOW, THEREFORE, SUBJECT TO THE APPROVAL OF THE COURT, the parties, by their respective counsel, hereby stipulate and agree that the time within which Defendant must answer, move or otherwise respond to the Complaint in the above-captioned matter shall be extended to November 1, 2022. No prior extension has been sought or granted.

Dated: September 15, 2022

For Plaintiffs:

WEINSTEIN LAW FIRM, LLC

/s/Marc E. Weinstein

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and

PENTIMA LAW FIRM, PLLC

/s/Vincent J. Pentima

Vincent J. Pentima

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Attorneys for Defendant County of Delaware

SO ORDERED:

Younge, J.